

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

Case Number: 4:21-cr-40052 JPG

JOSTEN DENWOOD )

Defendant. )

**DEFENDANT JOSTEN DENWOOD’S MOTION TO CONTINUE  
SENTENCING HEARING**

COMES NOW Defendant, JOSTEN DENWOOD, by and through his attorney, and respectfully moves this Court to continue the sentencing hearing, currently scheduled for February 14, 2024 at 10:00 a.m. to March 28, 2024, or approximately 30 to 45 days. Defendant submits the instant motion without objection from the Government, and in support of thereof, Defendant states the following:

1. Sentencing in the instant case is now set for February 14, 2024 at 10:00 a.m.
2. Defendant and his Counsel are gathering records regarding the factors in 18 U.S.C. 3553(a). To date, Defendant has gathered records relevant to his health, and schooling. However, the latter record appears to be incomplete. Defendant has identified institutions that may have additional information, but is awaiting records.
3. Furthermore, since his confinement in the Jackson County, Illinois jail, Defendant has been an active member in the Fallback Movement. Counsel for Defendant has verbally confirmed Defendant’s participation with the group, but is working with members to obtain

documentation of his involvement. To date, Counsel has not received the records, but expects to receive them within the next 30 days.

4. Without collecting and completing a review of the records and speaking with relevant witnesses, a sentence may be imposed that does not take into account issues relevant to Defendant's history and characteristics, and he may suffer prejudice without the consideration of said materials.

5. Defendant requests that the sentencing hearing in this matter be continued from February 14, 2024 to March 28, 2024, or approximately 30 to 45 days.

6. Counsel for Defendant conferred with Counsel for the Government, George Norwood, regarding the instant Motion, and files this Motion without objection from the Government.

7. Counsel for Defendant is unavailable from March 15, 2024 to March 22, 2024, due to a scheduled family vacation.

WHEREFORE Defendant, JOSTEN DENWOOD, without objection from the Government, respectfully moves this Court to continue the sentencing hearing, currently scheduled for February 14, 2024 at 10:00 a.m. to March 28, 2024, or approximately 30 to 45 days, or with any other relief as this court deems just and proper.

Respectfully submitted,

THE BOROWIAK LAW FIRM, LLC

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and accurate copy of the foregoing was served upon all counsel of record on this 6th day of February, 2024, via the Court's electronic filing system.

/s/Zachary J. Borowiak